

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

PETER LUEBKE,
individually, and on behalf of
all others similarly situated,

Plaintiff,

CASE NO. 17-cv-969-WED

v.

**WISCONSIN ELECTRIC POWER COMPANY d/b/a
WE ENERGIES,**

Defendant.

**PLAINTIFF'S MOTION FOR
AN AWARD OF ATTORNEYS' FEES AND COSTS**

Pursuant to the Court's Order granting preliminary approval of the Parties' Settlement Agreement (ECF No. 66), 29 U.S.C. §216(b), and Fed. R. Civ. P. 23, Plaintiff, by and through his attorneys, Hawks Quindel, S.C., hereby respectfully petitions the Court for an award of attorneys' fees and costs as set forth below and on the grounds set forth in Plaintiff's supporting brief and the accompanying declarations of Attorneys Larry A. Johnson, Brenda Lewison, and James A. Walcheske.

1. Class Counsel has negotiated a settlement of this FLSA collective action and Rule 23 class action on behalf of 793 Class Members employed by Defendant Wisconsin Electric Power Company ("We Energies");

2. The settlement creates a total, common settlement fund of \$4,236,231.10. Plaintiff petitions the Court for a recovery of 33.33% of the common fund for attorneys' fees, \$1,412,077.00. Additionally, Plaintiff petitions the Court for \$6,387.39 in costs, for a total of \$1,418,464.39.

3. As set forth in greater detail in Plaintiff's supporting brief, the requested attorneys' fees and costs are reasonable and consistent with the market rate in similar cases.

WHEREFORE, Plaintiffs respectfully request that the Court award attorneys' fees and costs as set forth above during the fairness hearing on February 12, 2019.

Respectfully submitted this 22nd day of January, 2019.

Respectfully submitted,

s/ Larry A. Johnson

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